

**EXHIBIT C**

**COMPLAINT**

**IN THE UNITED STATES  
JUSTICE OF THE PEACE COURT  
IN THE STATE OF DELAWARE**

**Plaintiff: Rebekah Harris  
2615 Chipmunk ct. Bear, DE 19701**

**Defendant: TransUnion LLC  
555 W Adams st. Chicago, IL 60606**

IN THE UNITED STATES  
JUSTICE OF THE PEACE COURT  
IN THE STATE OF DELAWARE

**NATURE AND STAGE OF PROCEEDING**

I Plaintiff, Rebekah E Harris am filing this action against TransUnion for the violation of 15 USC 1681 and Defamation of Character

**PARTIES**

Plaintiff, Rebekah E Harris “Rebekah Harris”  
Defendant, TransUnion LLC “TransUnion”

**SUMMARY OF ARGUMENT**

1. The court should award I Rebekah E Harris compensatory damages to cover financial losses incurred as a direct result of the defamation
2. The court should award I Rebekah E Harris Punitive damages to deter the defendant from future defamatory actions against I Rebekah E Harris
3. The court should rule in my Rebekah E Harrisr for there to be an injunction preventing the defendant TransUnion LLC from making further defamatory statements about I Rebekah E Harris.
4. The Court should award any other appropriate relief deemed necessary.

**STATEMENT OF FACTS**

1. For multiple years, I have encountered substantial inaccuracies in the consumer report provided to me by TransUnion LLC. These inaccuracies have had a detrimental effect on my creditworthiness, resulting in discriminatory treatment and rejections from companies such as Upstart Holdings, Onemain Financial, and Barclays Bank.  
**SEE EXHIBIT A, EXHIBIT B, EXHIBIT C, EXHIBIT D**
2. TransUnion has transmitted false information to these financial institutions, falsely indicating that I legally owed debts to companies Portfolio Recovery, Regional Acceptance Corp., and have made late payments to Capital One credit card company.

**SEE EXHIBIT A, EXHIBIT B, EXHIBIT C**

3. TransUnion has shared this information with Credit Karma, a multinational finance company, Experian Inc, Navy FCU, WEBANK, Klarna, One Main Financial, Lending Point LLC, to name a few of the non affiliated third parties the defendant has communicated this information to.

**SEE EXHIBIT A, EXHIBIT B, EXHIBIT C**

4. Despite numerous attempts to rectify these issues through online disputes and phone calls, explaining my consumer rights to their agents, they only conducted an investigation after repeated insistence. TransUnion failed to fulfill their responsibility of acting fairly, impartially, and respecting my right to privacy by communicating unverified information to others. This investigation should have been conducted prior to sharing any information as factual pursuant to 15 USC 1681.
  5. Following the investigation, TransUnion decided to remove all collection companies from my consumer report. Additionally, all late payments were eliminated, along with those associated with the Credit Card company Capital One. It was also revealed that Capital One admitted to fraudulent activities after TransUnion's investigation.
- SEE EXHIBIT E, EXHIBIT G, EXHIBIT H,**
6. Both the defendant and I have come to realize that TransUnion conveyed false or incorrect information as if it were true to myself Rebekah E Harris and multiple third parties. Although my consumer report has been partially corrected, the harm caused and the missed opportunities cannot be reversed.

**LEGAL ARGUMENT**

I request the Court to rule in my favor based on the fact that the banking system relies heavily on a credit report that is fair and accurate. Unfortunately, TransUnion has directly hindered the effectiveness of this system by providing incomplete, inaccurate, and false information when furnishing and communicating my consumer credit report to these banking systems. Despite their crucial role in gathering and assessing consumer credit information, they have failed to fulfill their duties, resulting in damage to my reputation and hindering my ability to obtain credit for personal, family, household, and business purposes. Moreover, they have violated my right to privacy by humiliating me through the dissemination of false information, presenting it as factual.

**LEGAL STANDARD**

Under Section 15 USC 1681(a)(1), it has been recognized by Congress that the banking system relies on fair and accurate credit reporting. Moreover, Congress has acknowledged that inaccurate consumer credit reports directly hinder the efficiency of the banking system, while unfair credit reporting practices undermine public confidence, which is crucial for the continued functioning of the banking system.

According to Section 15 USC 1681(a)(3)(4), consumer reporting agencies play a vital role in collecting and evaluating consumer credit and information. It is imperative to ensure that these agencies carry out their responsibilities with fairness, impartiality, and respect for consumers' right to privacy.

Section 15 USC 1681(b) Of congressional findings establishes the intention of this subchapter, which is to make it mandatory for consumer reporting agencies to establish fair and equitable procedures that meet the demands of commerce for consumer credit, personal, insurance, and other relevant information. These procedures should ensure the relevance and appropriate use of such information, in compliance with the provisions outlined in Section 15 USC 1681(a)(b).

Furthermore, Section 15 USC 1681(o) states that any person who negligently fails to comply with the requirements imposed by this subchapter concerning any consumer is liable to that consumer. The liability includes the sum of actual damages incurred by the consumer due to the failure, the cost of the action, and reasonable attorney's fees as determined by the court.

Finally, it is important to note the provisions stated in Section 15 USC 1681(b) regarding the circumstances under which a consumer reporting agency may provide a consumer report. These circumstances are limited to the following: 1) In response to a court order issued by a court with appropriate jurisdiction. 2) In accordance with written instructions provided by the consumer to whom the report pertains. 3) When the consumer reporting agency has reasonable grounds to believe that the information will be used in a manner unrelated to the current case. It is crucial to adhere to these specific circumstances outlined in the law when considering the furnishing of a consumer report by a consumer reporting agency.

**COUNT 1**  
**ESTABLISHING THE STAGE FOR**  
**THE DEFAMATION OF CHARACTER**  
**BY TRANSUNION LLC**

1. The burden of proof in establishing defamation of character lies with the plaintiffs, who must present the necessary elements to substantiate their claim.
2. The crucial components for proving defamation of character include: 1) A statement falsely presented as a factual assertion. 2) The dissemination or communication of that statement to a third party. 3) Fault that reaches a minimum level of negligence. 4) The resultant damage or harm inflicted upon the person's reputation.
3. The false statement purporting to be fact: The defendant made false statements purporting to be facts, claiming that I owed a debt of \$395.00 to Portfolio Recovery

LLC, owed a debt of \$1,646 to Regional Acceptance Corp, and had late payments to Capital One, a credit card company. Moreover, the defendant alleged that Capital One provided fraudulent information to them after the investigation, which they then communicated to other companies. Please note Capital One has also made it known that the account that TransUnion was communicating to myself and others was indeed fraudulent. **SEE EXHIBIT A, EXHIBIT B, EXHIBIT C, EXHIBIT F**

4. The Dissemination (publication) and communication of the statement to a third party: TransUnion has communicated this information to third party Credit Karma, a company who identifies as a multinational financial institution, Experian Inc a major credit reporting agency similar to TransUnion, Financial institutions Navy FCU, Upstart Holdings , Onemain Financial, and Barclays Bank. **SEE EXHIBIT B, EXHIBIT C, EXHIBIT A, EXHIBIT D**
5. Fault amounting to at least negligence: Negligence is proved by the defendants breach of duty of the subchapter 15 USC 1681(a)(b) which requires consumer reporting agencies to adopt reasonable procedures for meeting the needs of commerce for consumer credit, personnel, insurance, and other information in a manner which is fair and equitable to the consumer, with regard to the confidentiality, accuracy, relevancy, and proper utilization of such information in accordance with the requirements of this subchapter. The defendant has not adopted such a procedure stated in 15 USC 1681(a)(b) of the congressional findings in regards to my consumer report which is true and evident shown in the exhibits, the actions made before and after the investigation caused by my disputes of the information communicated by the defendant to myself and third parties. The defendant is liable for the damages caused pursuant to 15 USC 1681O for the defendants negligence. Furthermore to also prove fault amounting to at least negligence one must prove the following 1) Duty of care 2)Breach of Duty 3)Causation 4) damages.
  - a. (DUTY OF CARE) Pursuant to 15 USC 1681(a)(3) consumer reporting agencies such as TransUnion have assumed a vital role in evaluating consumer credit and other information on consumers. Pursuant to 15 USC 1681(b) Credit reporting agencies are required to adopt procedures for meeting the needs of the commerce for consumer credit [...] with regard to the confidentiality, accuracy, relevancy, and proper utilization of such information pursuant to 15 USC 168. The defendant has failed to do so.
  - b. (BREACH OF DUTY) After communicating with representatives from TransUnion, an investigation into my consumer report was initiated, and necessary corrections were made. Through this process, it became apparent that TransUnion failed to fulfill its duty in accurately evaluating information pertaining to me as a consumer. **SEE EXHIBIT E, EXHIBIT F**
  - c. (CAUSATION) As a result of the defendant's breach of duty, I experienced embarrassment, mental distress and have experienced discrimination and was denied loans and lines of credit by Navy FCU, Klarna, Upstart Holdings and Onemain Financial, as well as credit cards from Barclays Bank financial

institutions, the defendant communicated with during the previously explained events. The defendant's negligence in fulfilling their duty led to my unfair treatment and discrimination by these companies that provide credit cards, lines of credit and loans.

d. (DAMAGES)

The defendant's actions have caused me immense emotional distress knowing that my credit could not be extended until fraudulent collections, inaccurate payment history, and personal information not intended for public disclosure were removed from my consumer report. By knowingly communicating false information, despite being legally obligated to implement a system that would prevent such situations, the defendant clearly engaged in discriminatory behavior against me. Moreover, their failure to adopt appropriate systems allowed fraudulent collection agencies to harass me by utilizing the defendant as a medium of communication with me and any third parties seeking information from my consumer report.

Though I have requested that certain information be suppressed in my consumer report by TransUnion pursuant to 15 USC 1681(b), information which Capital One has also made known to the defendant that the information that they communicated was fraudulent, TranUnion continues to communicate these accounts along with closed accounts that should also be suppressed on my consumer report. Even if the accounts were accurate or valid I have the right pursuant to 15 USC 6802 to opt out of all sharing of my nonpublic personal information such balances or balance increases, late payments or payments made, and etc.

### **CONCLUSION**

Based on the aforementioned grounds, I, Rebekah E. Harris, respectfully request the following judgment from Defendant Transunion:

1. Granting statutory damages to the Plaintiff.
2. Awarding compensatory damages to the Plaintiff.
3. Ordering the Defendant to cover the costs associated with this legal action, including reasonable fees and expenses.
4. Granting punitive damages to the Plaintiff.
5. Providing any other suitable relief deemed necessary by the court.

**LIST OF EXHIBITS**  
**IN HARMONY WITH**  
**SUMMARY OF FACTS AND COUNT 1**

1. **EXHIBIT A** Transunion consumer report communicated with experian on 12/03/22
2. **EXHIBIT B** Transunion consumer report communicated to credit karma on 11/26/22
3. **EXHIBIT C** Transunion consumer report communicated to credit karma on 01/11/22
4. **EXHIBIT D** List of inquiring Third parties communicated to by Transunion between 01/2021 and 12/2022
5. **EXHIBIT E** Response letter to disputes, from the defendant to plaintiff dated 12/13/2022 showing Capital One account has been deleted from consumer report
6. **EXHIBIT F** Letter from Capital One admitting to fraud, also Informing myself Rebekah E Harris that they have sent updated information to TransUnion
7. **EXHIBIT G** TransUnion consumer report communicated to experian after investigation dated 07/05/2023
8. **EXHIBIT H** TransUnion consumer report communicated to Credit Karma after investigation

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3:08

~~EXHIBIT (A)~~

Experian Equifax TransUnion

**TransUnion® credit report****REBEKAH E HARRIS**

As of Dec 3, 2022

**FICO**

TransUnion data Dec 3, 2022

**531**

• POOR

300

850

**Personal information****NAME**

REBEKAH E HARRIS

**ALSO KNOWN AS****GENERATIONAL IDENTIFIER****YEAR OF BIRTH**

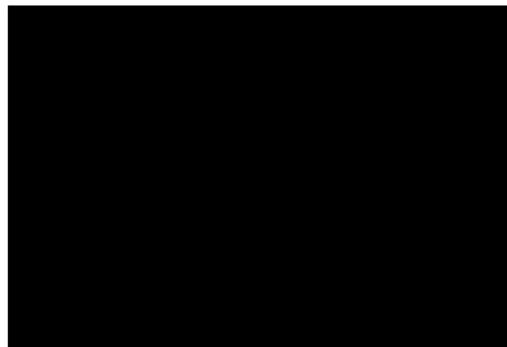
1998

**ADDRESSES**

3:09



ADDRESSES



EMPLOYERS

HMS HOST

PERSONAL STATEMENTS

FOR THE CAPITAL ONE THE CREDIT COMPANY THEY  
DID NOT LET ME KNOW THAT I HAVE AN OPTION TO  
OPT OUT TO

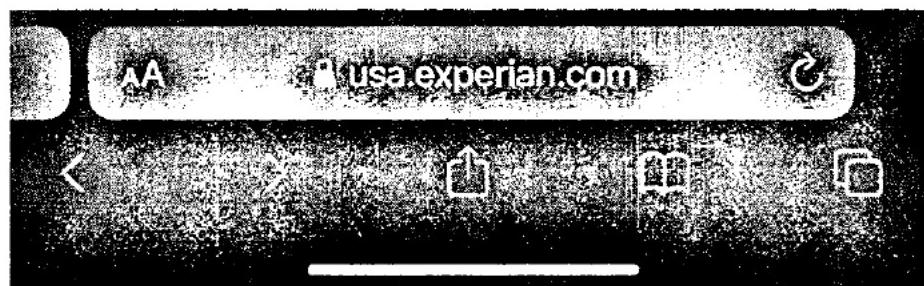
## Quick actions

Print your report  
[Open a printable version](#)

File a dispute  
[Visit the TransUnion website](#)

## You have 5 open accounts

Total balance: \$10,029



3:09



Total balance: \$10,029

### Credit cards or credit lines

Total balance: \$1,328

## 133% credit usage ⓘ

Credit used: \$1,000

Credit limit: \$1,000



### CAPITAL ONE >

#### LATE PAYMENT

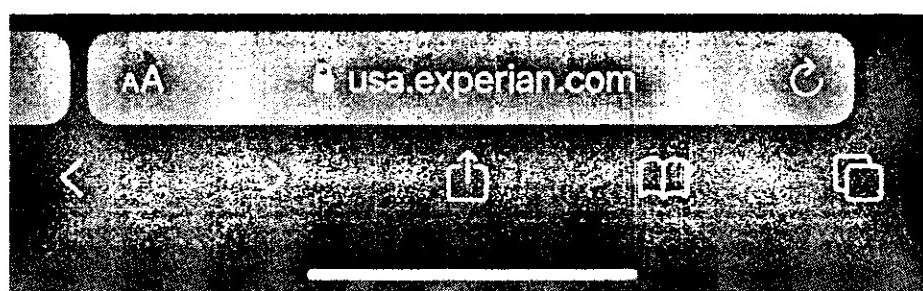
Balance	\$692
Balance updated	Nov 29, 2022

### CAPITAL ONE >

#### LATE PAYMENT

Balance	\$636
Balance updated	Nov 29, 2022

1 closed account ▾



# EXHIBIT (B)



[View report from](#)

Nov 26, 2022



You are viewing an out-of-date report. This does not reflect your current score.

## **REBEKAH E HARRIS**

**504**

Calculated using VantageScore 3.0

Provided by TransUnion

### **Personal Information**

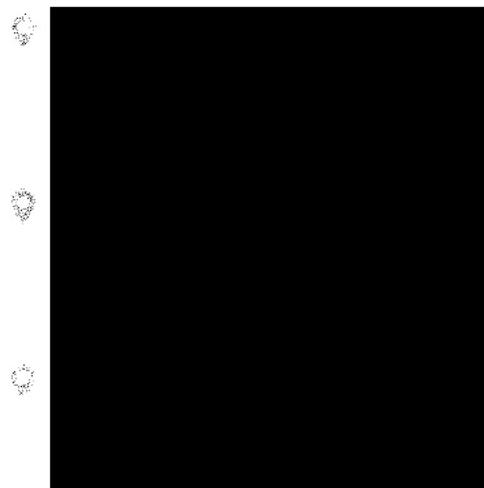
#### **NAMES REPORTED**

REBEKAH E HARRIS

#### **EMPLOYMENT INFO**

HMS HOST

#### **ADDRESSES REPORTED**



## Accounts

Here's every account on your TransUnion report. Click on the account name for more details.

### CREDIT CARDS

#### CAPITAL ONE

Reported: Nov. 19, 2022

\$692.00

Needs Attention

#### Overview

You're currently using **138%** of your account's limit.

Balance	Credit limit
\$692	\$500

Monthly payment	\$25
-----------------	------

Opened	May 23, 2022 (1 yr, 1 mo)
--------	---------------------------

#### Payment History

You've made **60%** of payments for this account on time.

	J	F	M	A	M	J	J	A	S	O	N	D
2022						✓	✓	✓	✗	✗		
	✓ Current	✗ Late	● Unknown									

Last payment	Jul. 15, 2022
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Current Payment Status	90-119 Days Late
------------------------	------------------

Amount past due	\$127
-----------------	-------

# EXHIBIT (C)



[View report from](#)

Jan 11, 2021



You are viewing an out-of-date report. This does not reflect your current score.

## REBEKAH E HARRIS

[Print report](#)

**550**

Calculated using VantageScore 3.0

Provided by TransUnion

## Personal Information

### NAMES REPORTED

REBEKAH E HARRIS

### EMPLOYMENT INFO

HMS HOST

### ADDRESSES REPORTED



## Accounts

Here's every account on your TransUnion report. Click on the account name for more details.

**AUTO LOANS**

**REGIONAL ACCEPTANCE CORP** \$1,646.00 +  
 Reported: Dec. 31, 2020 Closed

**CREDIT CARDS**

**CAPITAL BANK** \$190.00 +  
 Reported: Dec. 20, 2020 In good standing

**STUDENT LOANS**

**MOHELA/DEPT OF ED** \$3,539.00 +  
 Reported: Nov. 30, 2020 In good standing

**MOHELA/DEPT OF ED** \$5,056.00 +  
 Reported: Nov. 30, 2020 In good standing

**Hard Inquiries**

When you apply for a new credit account, a hard inquiry will usually get added to your report, which can make a small dent in your score. Here are the inquiries on your TransUnion report.

**IMW ASSOC DBA WEIMARK** Miscellaneous +  
 Inquiry: Oct. 16, 2019

**SUN EAST FEDERAL CREDIT** Finance/Personal +  
 Inquiry: Jul. 01, 2019

**Collections**

If you've fallen behind on payments, your account could be sent to a collections agency. This

can have a big impact on your credit score.

## PORTFOLIO RECOVERY

Reported: Dec. 28, 2020

\$395.00 +

Needs Attention

## Public Records

Things like bankruptcies and legal judgments against you can show up on your credit report and do some damage to your score.

*Lookin' good! As of Jan. 11, 2021, you have no public records on your report.*

## Suggested for your credit

We suggest offers based on your credit, Approval Odds, and money we make from our partners.

## Advertiser Disclosure

## Suggested cards

### Discover it® Secured Credit Card



Your chance of approval is **excellent**



#### MIN. DEPOSIT

\$200

Refundable

#### REGULAR PURCHASE APR

27.99%\* Variable

#### ANNUAL FEE

\$0

#### REWARDS RATE

1% - 2%

Cash Back

## Consumer Credit Report for REBEKAH E. HARRIS

**EXHIBIT (D)**

Page: 3 of 7 File Number: 403838788 Date Issued: 12/13/2022

	11/2016	10/2016
Rating	OK	OK

**MOHELA/DEPT OF ED**

Date Opened: 09/22/2016  
 Responsibility: Individual Account  
 Account Type: Installment Account  
 Loan Type: STUDENT LOAN  
 Remarks: CLOSED

( 633 SPIRIT DRIVE, CHESTERFIELD, MO 63005, (800) 666-4352 )

Balance: \$0  
 Date Updated: 12/19/2016  
 Payment Received: \$0  
 High Balance: \$2,000

Pay Status: Paid, Closed; was Paid as agreed  
 Terms: \$0 per month, paid Monthly  
 Date Closed: 12/19/2016

	11/2016	10/2016
Rating	OK	OK

**MOHELA/DEPT OF ED**

Date Opened: 09/22/2016  
 Responsibility: Individual Account  
 Account Type: Installment Account  
 Loan Type: STUDENT LOAN  
 Remarks: CLOSED

( 633 SPIRIT DRIVE, CHESTERFIELD, MO 63005, (800) 666-4352 )

Balance: \$0  
 Date Updated: 12/19/2016  
 Payment Received: \$0  
 High Balance: \$1,000

Pay Status: Paid, Closed; was Paid as agreed  
 Terms: \$0 per month, paid Monthly  
 Date Closed: 12/19/2016

	11/2016	10/2016
Rating	OK	OK

**MORGAN PROPERTIES MANAGEMENT COMPANY LLC**

Date Opened: 07/29/2022  
 Responsibility: Joint Account  
 Account Type: Open Account  
 Loan Type: RENTAL AGREEMENT

Balance: \$0  
 Date Updated: 10/31/2022  
 Payment Received: \$1,800  
 Last Payment Made: 10/02/2022  
 High Balance: \$1,815

Pay Status: Current; Paid or Paying as Agreed  
 Terms: Paid Monthly  
 Date Paid: 10/02/2022

	09/2022	08/2022
Rating	OK	OK

**OPENSKY CAPITAL BANK NA**

Date Opened: 05/22/2020  
 Responsibility: Individual Account  
 Account Type: Revolving Account  
 Loan Type: CREDIT CARD

PO BOX 8130, RESTON, VA 20195, (800) 859-6412  
 Balance: \$0  
 Date Updated: 07/21/2021  
 Payment Received: \$64  
 Last Payment Made: 06/17/2021  
 High Balance: \$212  
 Credit Limit: \$300

Pay Status: Paid, Closed; was Paid as agreed  
 Terms: Paid Monthly  
 Date Closed: 07/21/2021  
 Date Paid: 05/17/2021

Remarks: ACCOUNT CLOSED BY CONSUMER; CLOSED

	06/2021	05/2021	04/2021	03/2021	02/2021	01/2021	12/2020	11/2020	10/2020	09/2020	08/2020	07/2020
Rating	OK											
	06/2020											
Rating	OK											

## Regular Inquiries

**CAPITAL ONE** ( 15000 CAPITAL ONE, RICHMOND, VA 23238, (800) 955-7070 )

Inquiry Type: Individual

Requested On: 05/23/2022, 07/23/2021

## Promotional Inquiries

**TRANSUNION CONSUMER INT'L** ( 100 CROSS STREET, SAN LUIS OBISP, CA 93401, (805) 782-8282 )

Requested On: 12/07/2022, 12/03/2022, 12/02/2022, 10/27/2022, 07/27/2022, 07/21/2022, 06/22/2022, 04/20/2022, 03/23/2022

**FIRST PREMIER** ( 3820 N LOUISE AVE, SIOUX FALLS, SD 57107-0145, (800) 987-5521 )

Requested On: 09/04/2022

**FEB PERSONIFY FINANCIAL** ( 15373 INNOVATION DRIVE, SUITE 380, SAN DIEGO, CA 92128, (888) 578-9546 )

Requested On: 07/12/2022

**CITI CARDS CBNA** ( POB 6241, SIOUX FALLS, SD 57117, (800) 995-5114 )

Requested On: 05/27/2022

**BARCLAYS BANK DELAWARE** ( PO BOX 8803, WILMINGTON, DE 19899, (888) 232-0780 )

Requested On: 04/13/2022

**TBOM/FORTIVA** ( 5 CONCOURSE PKWY, SUITE 300, ATLANTA, GA 30328, (770) 828-2000 )

Requested On: 04/11/2022

**ALLSTATE INSURANCE** (2775 SANDERS RD, NORTHBROOK, IL 60062-6110, (800) 255-7828)  
Requested On: 03/11/2022, 01/07/2022

**TBOM - MILESTONE** (15220 NW GREENBRIER PKWY., SUITE 200, BEAVERTON, OR 97006, (503) 222-9960)  
Requested On: 02/20/2022

**TBOM/ASPIRE** (PO BOX 105555 SW 1340, ATLANTA, GA 30348, (855) 802-5572)  
Requested On: 02/18/2022

**AXCESS FINANCIAL/CNGO** (7755 MONTGOMERY RD, STE 400, CINCINNATI, OH 45236, (888) 296-2274)  
Requested On: 02/17/2022

**CB INDIGO** (PO BOX 4499, BEAVERTON, OR 97076, (866) 946-9545)  
Requested On: 02/03/2022

**T-MOBILE** (12920 SE 38TH STRE, BELLEVUE, WA 98006, (800) 318-9270)  
Requested On: 01/27/2022

## Account Review Inquiries

**REBEKAH HARRIS via KARMATRANSUNION INTERACT** (100 CROSS STREET, SAN LUIS OBISPO, CA 93401, (844) 580-6816)  
Permissible Purpose: CONSUMER REQUEST  
Requested On: 12/12/2022

**REBEKAH HARRIS via TRANSUNION INTERACTIVE IN** (100 CROSS ST, STE 202, SAN LUIS OBISPO, CA 93401, (855) 681-3196)  
Permissible Purpose: CONSUMER REQUEST  
Requested On: 12/11/2022

**CAPITAL ONE** (P O Box 31293, Salt Lake City, UT 84131, (800) 955-7070)  
Requested On: 12/11/2022

**TRANSUNION CONSUMER INT** (760 MARKET STREET 10TH FLOOR, SAN FRANCISCO, CA 94102, (844) 580-6816)  
Permissible Purpose: CREDIT MONITORING  
Requested On: 12/10/2022

**REBEKAH HARRIS via TUCI ARRAY** (100 CROSS STREET, SUITE 101, SAN LUIS OBISPO, CA 93401, (844) 580-6816)  
Permissible Purpose: CONSUMER REQUEST  
Requested On: 12/08/2022, 12/02/2022, 11/25/2022, 11/19/2022, 11/15/2022, 11/09/2022, 11/03/2022, 10/27/2022, 10/20/2022, 10/17/2022, 10/11/2022, 10/02/2022, 09/25/2022, 09/20/2022, 09/13/2022, 09/06/2022, 08/30/2022, 08/23/2022, 08/16/2022, 08/10/2022, 08/03/2022, 07/28/2022, 07/21/2022, 07/14/2022, 07/07/2022, 06/30/2022, 06/23/2022, 06/16/2022, 06/06/2022, 05/29/2022, 05/21/2022, 05/14/2022, 05/07/2022, 04/30/2022, 04/23/2022

**REBEKAH HARRIS via CREDITWISE CAPONETUI** (1680 CAPITAL ONE DRIVE, MCLEAN, VA 22102, (877) 383-4802)  
Permissible Purpose: CONSUMER REQUEST  
Requested On: 12/07/2022, 11/22/2022, 10/21/2022, 09/20/2022, 08/20/2022, 07/23/2022, 06/23/2022, 05/23/2022, 04/25/2022, 03/28/2022, 02/28/2022, 01/30/2022, 12/31/2021, 12/03/2021, 11/05/2021, 10/04/2021, 09/03/2021, 08/04/2021, 07/08/2021, 05/18/2021, 04/20/2021, 03/24/2021, 02/24/2021, 01/26/2021, 12/30/2020

**PORTFOLIO RECOVERY ASSOCIATES** (140 CORPORATE BLVD, NORFOLK, VA 23502, (844) 675-3407)  
Requested On: 12/06/2022

**CONSUMERINFO via CONSUMER INFO.COM** (PO BOX 2390, ALLEN, TX 75013, (877) 481-6826)  
Permissible Purpose: CONSUMER REQUEST  
Requested On: 12/03/2022

**CONSUMERINFO.COM** (475 ANTON BLVD, COSTA MESA, CA 92626, (888) 397-3742)  
Requested On: 12/03/2022, 11/28/2022, 11/01/2022

**364177185 via CREDITWISE CAPONETUI** (1680 CAPITAL ONE DRIVE, MCLEAN, VA 22102, (877) 383-4802)  
Permissible Purpose: CREDIT MONITORING  
Requested On: 12/01/2022

**277411822 via TRANSUNION INTERACTIVE** (100 CROSS STREET 202, SAN LUIS OBISPO, CA 93401, (844) 580-6816)  
Permissible Purpose: CREDIT MONITORING  
Requested On: 12/01/2022

**RADIUS GLOBAL SOLUTIONS** (7831 GLENROY RD, SUITE 145, EDINA, MN 55439, (866) 720-0820)  
Requested On: 11/29/2022, 11/09/2021

**TUCI - DC TARGETED** (100 CROSS STREET, SUITE 101, SAN LUIS OBISPO, CA 93401, (844) 580-6816)  
Requested On: 11/28/2022

## Consumer Credit Report for REBEKAH E. HARRIS

**FACT FREE DISCLOSURE** (P O BOX 1000, CHESTER, PA 19016, (800) 888-4213)

Requested On: 11/20/2022

**VERIZON** (500 TECHNOLOGY DRIVE, STE 300, WELDON SPRING, MO 63304, (800) 837-4966)

Permissible Purpose: COLLECTION

Requested On: 10/27/2022

**CAPITAL ONE** (P O Box 31293, Salt Lake City, UT 84131, (800) 955-7070)

Requested On: 10/11/2022

**WEBBANKKLARNA** (629 N HIGH ST, STE 300, COLUMBUS, OH 43215, (844) 552-7621)

Requested On: 09/04/2022

**KLARNA** (629 NORTH HIGH STREET SUI, TE 300, COLUMBUS, OH 43215, (844) 552-7621)

Requested On: 09/04/2022

**NAVY FCU** (820 FOLLIN LANE, VIENNA, VA 22180, (888) 842-6328)

Requested On: 08/15/2022

**CAPITAL ONE** (15000 CAPITAL ONE DRIVE, US565724, RICHMOND, VA 23238, (800) 955-7070)

Permissible Purpose: INSURANCE UNDERWRITING

Requested On: 05/23/2022, 07/23/2021

**CAPITAL ONE** (PO BOX 30281, SALT LAKE CITY, UT 84130, (800) 955-7070)

Requested On: 05/23/2022, 07/23/2021

**PROSPER MARKETPLACE** (221 MAIN ST 3RD FLOOR, SAN FRANCISCO, CA 94105, (866) 615-6319)

Requested On: 05/11/2022

**UPSTART NETWORK INC** (2 CIRCLE STAR WAY, 2ND FLOOR, SAN CARLOS, CA 94070, (650) 204-1000)

Requested On: 05/11/2022, 06/09/2021, 02/17/2021

**LENDINGPOINT LLC** (1301 SHILOH RD NW, SUITE 130, KENNESAW, GA 30144, (888) 969-0959)

Requested On: 05/11/2022

**ONEMAIN FINANCIAL** (P.O. BOX 3327, EVANSVILLE, IN 47706, (844) 298-9773)

Requested On: 05/11/2022

**PROSPERWEBBANK** (PROSPER WEBBANK, 221 MAIN STREET SUITE 300, SAN FRANCISCO, CA 94105, (866) 615-6319)

Requested On: 05/11/2022

**REBEKAH HARRIS via TUCI - LENDING TREE** (100 CROSS STREET, SUITE 101, SAN LUIS OBISPO, CA 93401, (844) 580-6816)

Permissible Purpose: CONSUMER REQUEST

Requested On: 05/11/2022, 02/17/2021

**LENDINGPOINT** (1301 SHILOH RD NW, KENNESAW, GA 30144, (888) 969-0959)

Requested On: 05/11/2022

**PERSONIFY** (15373 INNOVATION DR, SUITE 250, SAN DIEGO, CA 92128, (888) 578-9546)

Requested On: 05/11/2022, 06/09/2021, 02/17/2021

**NETCREDIT FS** (175 W JACKSON BLVD., SUITE 1000, CHICAGO, IL 60604, (877) 392-2014)

Permissible Purpose: WRITTEN AUTHORIZATION

Requested On: 05/11/2022

**MARLETTE FUNDING** (PO BOX 42912, PHILADELPHIA, PA 19101, (855) 282-6353)

Requested On: 05/11/2022

**ON THE BARRELHEAD INC** (1309 E 3RD AVE, UNIT 202, DURANGO, CO 81301, (314) 359-9248)

Permissible Purpose: WRITTEN AUTHORIZATION

Requested On: 05/11/2022

**CENTRAL CREDIT SERVICES** (9550 REGENCY SQUARE BLVD, SUITE 602, JACKSONVILLE, FL 32225, (888) 904-1800)

Requested On: 05/04/2022

**TU INTERACTIVE** (100 CROSS ST, 202, SAN LUIS OBISPO, CA 93401, (844) 580-6816)

Requested On: 03/08/2022

**T-MOBILE** (12920 SE 38TH ST, BELLEVUE, WA 98006, (800) 937-8997)

Requested On: 01/31/2022

**TRANSUNION INTERACTIVE** (100 CROSS STREET, SUITE 202, SAN LUIS OBISPO, CA 93401, (805) 782-8282)

Requested On: 11/04/2021

**AFFIRM INC** (650 CALIFORNIA STREET, FLOOR 12, SAN FRANCISCO, CA 94108, (855) 423-3729)  
Requested On: 09/23/2021

**JPMCB CONSUMER BANK** (PO BOX 15298, WILMINGTON, DE 19850, (800) 935-9935)  
Requested On: 09/07/2021, 09/06/2021, 08/01/2021, 07/22/2021

**CAPITAL ONE** (15070 CAPITAL ONE DR, RICHMOND, VA 23238, (800) 955-7070)  
Requested On: 07/23/2021

**MERCANTILE ADJ BUREAU 1** (165 LAWRENCE BELL DR, SUITE 100, WILLIAMSVILLE, NY 14221, (800) 480-7094)  
Requested On: 04/02/2021

**QUINSTREET** (950 TOWER LANE, FOSTER CITY, CA 94404, (650) 578-7700)  
Permissible Purpose: INSURANCE UNDERWRITING  
Requested On: 02/17/2021

**LENDING CLUB BANK** (595 MARKET ST, SUITE 200, SAN FRANCISCO, CA 94105, Phone number not available)  
Requested On: 02/17/2021

**STONEYBROOK APA via SCREENING REPORTS INC** (220 GERRY DR, WOOD DALE, IL 60191, (866) 389-4042)  
Permissible Purpose: TENANT SCREENING  
Requested On: 01/13/2021

## Consumer Statement

FOR THE CAPITAL ONE THE CREDIT COMPANY THEY DID NOT LET ME KNOW THAT I HAVE AN OPTION TO OPT OUT TO SHARING MY PERSONAL INFORMATION TO THE NON AFFILIATE THIRD PARTY.

(Note: This statement has no expiration date.)

## Additional Information

The following disclosure of information might pertain to you. This additional information may include Special Messages, Office of Foreign Assets Control ("OFAC") Potential Name Matches, Inquiry Analysis, Military Lending Act ("MLA") Covered Borrower Information, Third Party Supplemental Information and/or Consumer Contributed Financial Information. Authorized parties may also receive the additional information below from TransUnion.

## Third Party Supplemental Information

In addition to the information maintained in the above credit report, TransUnion will occasionally contact a third party for supplemental information in connection with a particular transaction in response to a request from a particular customer. Listed below is the supplemental data that TransUnion obtained from such third parties, as well as the name(s) of the TransUnion customer for whom it was obtained.

### CHECKING ACCOUNT AND DEMAND DEPOSIT ACCOUNT (DDA) ACTIVITY

Data Source: Chex Systems Inc. (7805 Hudson Road, Suite 100, Woodbury, MN 55125, (800) 513-7125)

Requested by: EXETER FINANCE CORP

Requested on: 3/06/2018

Checking Account Inquiries in the Last Month: 0

Checking Account Inquiries in the Last 2 Months: 0

Checking Account Inquiries in the Last 3 Months: 0

Checking Account Inquiries in the Last 6 Months: 0

Checking Account Inquiries in the Last Year: 0

Checking Account Inquiries in the Last 2 Years: 2

DDA Inquiries in the Last 3 Years: 2

Total Days Since First Checking Account Inquiry: 462

Days Since Most Recent DDA Inquiry: 369

DDA & Credit/Non-DDA Inquiries in Last 3 Years: 2

### SUPPLEMENTAL CONSUMER CREDIT INFORMATION

Data Source: CoreLogic Inc. (1 CoreLogic Drive, Westlake, TX 76262, (866) 873-3651)

Requested by: EXETER FINANCE CORP

Requested on: 03/06/2018

Number of Evictions: 0

Auto Finance Inquiries in the Last 3 Months: 2

Auto Finance Inquiries in the Last 6 Months: 2

Auto Finance Inquiries in the Last 9 Months: 2

Auto Finance Inquiries in the Last 12 Months: 2

Auto Finance Inquiries in the Last 24 Months: 2

Auto Finance Inquiries in the Last 7 Years: 2

Cash Advance Inquiries in the Last 3 Months: 0

Cash Advance Inquiries in the Last 6 Months: 0

\*\*\* 403838788-026 \*\*\*

TransUnion LLC  
PO Box 805  
Woodlyn, PA 19094-0805



# EXHIBIT (E)

12/13/2022



Information for Good.

PH64V400202461-I033531-099370210



REBEKAH E. HARRIS  
1009 PAISLEY LN  
NEW CASTLE, DE 19720-3812

Dear REBEKAH E. HARRIS,

We understand that recently something on your credit report did not seem right to you. We take this matter seriously, and we want to make sure your TransUnion credit report is accurate. It's our commitment to you.

Our investigation of the dispute you submitted is now complete. After a review of your dispute and any provided documentation, we took one or more of the following action(s):

1. Updated your credit report based on the information you provided; OR
2. Determined that the information you disputed either does not appear on your credit file or already shows the requested status; OR
3. Determined that the data furnisher had previously verified the reported information. If any of the items you disputed were previously verified, a separate communication was sent to you listing those items along with the data furnisher's contact information; OR
4. Asked the data furnisher reporting the information you disputed to do all of the following:
  - Review relevant information we sent them, including any provided documents
  - Investigate your dispute and verify whether the information they report is accurate
  - Provide us a response to your dispute and update any other information
  - Update their records and systems, if necessary;

Should you wish to receive the above description of the procedures we used to investigate your dispute in a separate communication for your records, please contact TransUnion.

Your dispute is important. In the pages that follow, you will see your detailed investigation results, including the name and contact details of the source of the information. Please review the results carefully. To view a full copy of your credit report and for more information about how to read your credit report, please visit [www.transunion.com/fullreport](http://www.transunion.com/fullreport).

## How to Read Your Investigation Results

You will see that, for each disputed item, a summary explanation appears in the gray box, followed by a brief paragraph describing the results of our investigation, followed by a view of how the item appears in your updated credit report. Please note any changes we made to personal information (name, address, employment, SSN, date of birth) will appear at the end of **Your Investigation Results**.

## A Note on Credit Report Updates

Information in your credit report is updated frequently which means items you disputed may not appear on your credit report or have already changed by the time we received your dispute. In most cases, the **Date Updated** represents the last time the account information was updated or reported by the data furnisher. Please note that this date may not change following our investigation of your dispute. For **Payment Received** and **Last Payment Made**, please keep in mind, the data may not represent very recent payment activity.

If information was removed or updated as a result of your dispute, the "Your Investigation Results" section below will note that an update was made. An update can include a change to the information or the removal of the information entirely from your credit file. For example, if a field was removed as a result of your dispute, the description will indicate that a change was made to that field. If information was removed, it will no longer appear in the account details.

## Definitions

For your reference, here are some definitions to help you understand **Your Investigation Results**.

### For ACCOUNTS:

<b>Balance:</b> The balance owed as of the date the account was verified or reported	<b>Original Charge Off:</b> If applicable, the amount charged off due to non-payment of the account
<b>Credit Limit:</b> The maximum amount of credit approved by the creditor on the account	<b>Past Due:</b> The amount past due as of the date the account was verified or reported
<b>Date Opened:</b> The date the account was Opened	<b>Pay Status:</b> The current status of the account; how you are currently paying. For accounts that have been paid and closed, sold, or transferred, it represents the last reported status of the account.
<b>High Balance:</b> The highest amount ever owed on an account	<b>Remarks:</b> If applicable, the creditor may provide additional information here related to the account
<b>Last Payment Made:</b> The date the creditor received the last payment on the account	<b>Responsibility:</b> The type of contractual ownership (individual, joint, authorized user, etc.) of the account
<b>Maximum Delinquency:</b> If applicable, the maximum amount past due before an account becomes a charge-off or a collection account	<b>Terms:</b> The monthly payment amount or monthly minimum payment due on the account

### Historical Trended Data

Accounts on your credit report may include historical account information, which TransUnion has collected from account updates provided by your creditor for up to 30 months. On your credit report, this historical trended data may have appeared in a grid below each account along with information reflecting the timeliness of your payments and may include the following data: Date Updated, Balance, Amount Due, Amount Paid, Past Due, Credit Limit, High Balance and Remarks.

Please note: Once an account is disputed, the historical trended data is removed from your credit file and will not be displayed on these results. However, the rating information reflecting the timeliness of your payments will remain and reflect any updates provided by the creditor, if applicable.

File Number: 403838788  
Date Issued: 12/13/2022

Page 5 of 8

## Your Investigation Results

**INVESTIGATION RESULTS - DELETED:** The disputed item(s) was removed from your credit report.

**CAPITAL ONE** [REDACTED] P O Box 31293, Salt Lake City, UT 84131, (800) 955-7070 )  
In response to your dispute, this item was **DELETED** from your credit report.

.....

File Number: 1:23-cv-00899-RGA  
Date Issued: 12/13/2022

Page 6 of 8

**INVESTIGATION RESULTS - VERIFIED AS ACCURATE AND UPDATED:** The disputed item(s) was verified as accurate; however, other information has also changed.

**CAPITAL ONE**

( P O Box 31293, Salt Lake City, UT 84131, (800) 955-7070 )

We investigated the information you disputed and the disputed information was **VERIFIED AS ACCURATE**; however, we updated: **Date Updated; Remarks; Maximum Delinquency; Rating; Historical Trended Data**. Here is how this account appears on your credit report following our investigation.

Date Opened:	07/23/2021	Balance:	\$636	Pay Status:	>Account 60 Days Past Due Date<
Responsibility:	Individual Account	Date Updated:	11/30/2022	Terms:	\$61 per month, paid Monthly
Account Type:	Revolving Account	Last Payment Made:	07/18/2022	>Maximum Delinquency of 60 days in 11/2022 for \$67<	
Loan Type:	CREDIT CARD	High Balance:	\$636		
		Credit Limit:	\$500		
		Past Due:	>\$67<		

Remarks: DISP INVG COMP-RPT BY GRNTR

Estimated month and year that this item will be removed: 09/2029

	10/2022	09/2022	08/2022	07/2022	06/2022	05/2022	04/2022	03/2022	02/2022	01/2022	12/2021	11/2021
Rating	X	30	OK	30	OK	OK						
	10/2021	09/2021	08/2021	07/2021								
Rating	OK	OK	OK	OK								

**OPENSKY CAPITAL BANK NA**

( PO BOX 8130, RESTON, VA 20195, (800) 859-6412 )

We investigated the information you disputed and the disputed information was **VERIFIED AS ACCURATE**; however, we updated: **Date Updated; Rating; Payment Received; Historical Trended Data**. Here is how this account appears on your credit report following our investigation.

Date Opened:	05/22/2020	Balance:	\$0	Pay Status:	Paid, Closed; was Paid as agreed
Responsibility:	Individual Account	Date Updated:	07/21/2021	Terms:	Paid Monthly
Account Type:	Revolving Account	Payment Received:	06/17/2021 (\$64)	Date Closed:	07/21/2021
Loan Type:	CREDIT CARD	Last Payment Made:	06/17/2021	Date Paid:	06/17/2021
		High Balance:	\$212		
		Credit Limit:	\$300		

Remarks: ACCOUNT CLOSED BY CONSUMER; CLOSED

	06/2021	05/2021	04/2021	03/2021	02/2021	01/2021	12/2020	11/2020	10/2020	09/2020	08/2020	07/2020
Rating	OK											
	06/2020											
Rating	OK											

**VERIZON #556081384\*\*\*** ( 500 TECHNOLOGY DRIVE, WELDON SPRINGS, MO 63304, (800) 837-4966 )

We investigated the information you disputed and the disputed information was **VERIFIED AS ACCURATE**; however, we updated: **Balance; Date Updated; Past Due; Remarks**. Here is how this account appears on your credit report following our investigation.

Date Opened:	10/29/2019	Balance:	\$106	Pay Status:	>In Collection<
Responsibility:	Individual Account	Date Updated:	11/30/2022	Date Closed:	08/15/2022
Account Type:	Open Account	Payment Received:	(\$0)		
Loan Type:	UTILITY COMPANY	High Balance:	\$0		
		Past Due:	>\$106<		

Remarks: DISP RSLV/CSMR DSG/CNSM CLS; &gt;PLACED FOR COLLECTION&lt;

Estimated month and year that this item will be removed: 02/2029



Capital One  
P.O. Box 30277  
Salt Lake City, UT 84130-0277

December 07, 2022

REBEKAH E HARRIS 000037377  
2615 CHIPMUNK CT L1112  
BEAR, Delaware 19701

Re: Account ending in [REDACTED]  
Case Number: [REDACTED]

Dear REBEKAH E HARRIS,

We are happy to tell you that your identity fraud investigation is now closed. We found the account to be fraudulent and you were not held responsible.

We have sent updated information to the credit reporting agencies for them to remove this Capital One account from your credit file. The credit reporting agencies may take up to 60 days to update the information on your credit report, so please keep this letter for your records.

For more information on how to further protect your identity, you can contact the groups listed below. You can also find valuable information on our website at [capital.one/identity-protection](http://capital.one/identity-protection).

Federal Trade Commission: 1-877-438-4338 - [www.consumer.ftc.gov](http://www.consumer.ftc.gov)  
Equifax: 1-888-685-1111 - [www.equifax.com](http://www.equifax.com)  
Experian: 1-888-397-3742 - [www.experian.com](http://www.experian.com)  
TransUnion: 1-800-680-7289 - [www.transunion.com](http://www.transunion.com)

If you have any questions, please give us a call toll free at 1-800-215-1921. We're available Monday through Friday from 8 a.m. to 8 p.m. ET.

Sincerely,

Capital One

2:30

EXHIBIT (G)

experian



← Your credit reports

Experian Equifax TransUnion

**TransUnion® credit report**  
**REBEKAH E HARRIS**  
As of Jul 5, 2023 ▾

FICO

TransUnion data Jul 5, 2023

**567**

● POOR

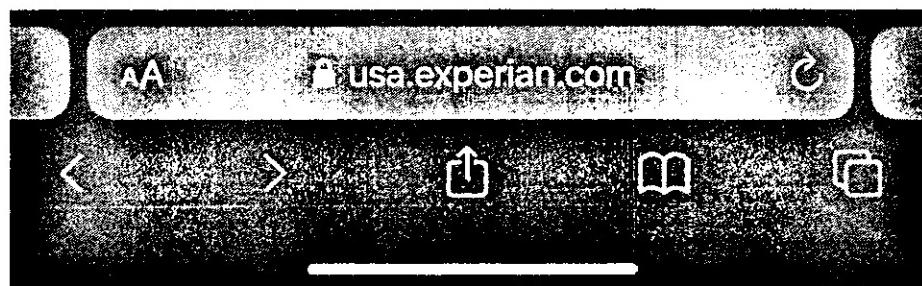
300

850



88 days until your next TransUnion® report  
refresh

The report refresh included in your membership isn't



2:30



refresh.

[Buy your report](#)

## Personal information

### NAME

REBEKAH E HARRIS

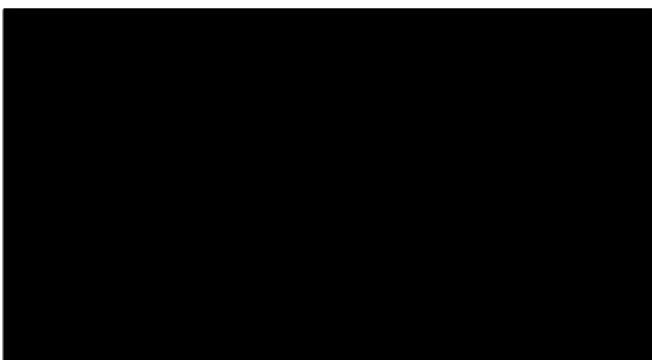
### ALSO KNOWN AS

### GENERATIONAL IDENTIFIER

### YEAR OF BIRTH

1998

### ADDRESSES



### EMPLOYERS

HMS HOST

### PERSONAL STATEMENTS

FOR THE CAPITAL ONE THE CREDIT COMPANY THEY  
DID NOT LET ME KNOW THAT I HAVE AN OPTION TO  
OPT OUT TO

2:32



## You have 3 open accounts

Total balance: \$9,299

### Credit cards or credit lines

Total balance: \$704



CAPITAL ONE



Balance	\$704
Balance updated	Jun 13, 2023



OPENSKY CBNK



Balance	\$0
Balance updated	Jul 21, 2021

2 closed accounts ^

### Installment accounts

Total balance: \$8,595



MOHELA/DOFED



Balance	\$5,056
Balance updated	May 31, 2023

2:33



MOHELA/DOFED



Balance \$3,539

Balance updated May 31, 2023



MOHELA/DOFED



Balance \$0

Balance updated Dec 19, 2016



MOHELA/DOFED



Balance \$0

Balance updated Dec 19, 2016



MOHELA/DOFED



Balance \$0

Balance updated Dec 19, 2016

3 closed accounts ^

### Other accounts

Total balance: \$0

11:06



◀ Search

INTUIT  
creditkarma

## Hard Inquiries

When you apply for a new credit account, a hard inquiry will usually get added to your report, which can make a small dent in your score. Here are the inquiries on your TransUnion report.

### CAPITAL ONE

Inquiry: May 23, 2022

Bank



(800) 955-7070

### CAPITAL ONE

Inquiry: Jul. 23, 2021

Bank



(800) 955-7070

## Collections

If you've fallen behind on payments, your account could be sent to a collections agency. This can have a big impact on your credit score.

*Clean slate! As of Jun. 19, 2023, you have no collection accounts on your credit report.*

## Public Records

Things like bankruptcies and legal judgments against you can show up on your credit report and do some damage to your score.

*Lookin' good! As of Jun. 19, 2023, you have no public records on your report.*



Today



Credit



Cards



Loans



Money

◀ Search

INTUIT  
creditkarma

## Accounts

Here's every account on your TransUnion report. Click on the account name for more details.

### See an error?

You can submit a dispute without leaving Credit Karma. Look for Direct Dispute™ in the details of the account.

#### CREDIT CARDS

##### CAPITAL ONE

\$704.00



Closed

Reported: Jun. 13, 2023

##### OPENSKY CAPITAL BANK

NA

\$0.00



Closed

Reported: Jul. 21, 2021

#### OTHER LOANS

##### MORGAN PROPERTIES MANAGE

\$0.00

In good  
standing

Reported: Apr. 30, 2023

##### VERIZON

\$0.00



Closed

Reported: Mar. 25, 2023

  
Hide closed (1)

Today



Credit



Cards



Loans



Money

◀ Search

INTUIT  
creditkarma

## STUDENT LOANS

<b>MOHELA/DEPT OF ED</b>	\$3,539.00	+
Reported: May 31, 2023	In good standing	
<b>MOHELA/DEPT OF ED</b>	\$5,056.00	+
Reported: May 31, 2023	In good standing	
<b>MOHELA/DEPT OF ED</b>	\$0.00	+
Reported: Dec. 19, 2016	Closed	
<b>MOHELA/DEPT OF ED</b>	\$0.00	+
Reported: Dec. 19, 2016	Closed	
<b>MOHELA/DEPT OF ED</b>	\$0.00	+
Reported: Dec. 19, 2016	Closed	

Hide closed (3)

## Hard Inquiries

When you apply for a new credit account, a hard inquiry will usually get added to your report, which can make a small dent in your score. Here are the inquiries on your TransUnion report.

<b>CAPITAL ONE</b>	Bank	+
Inquiry: May 23, 2022	(800) 955-7070	



Today



Credit



Cards



Loans



Money

2:33



VERIZON



Balance

\$0

Balance updated

Mar 25, 2023

1 closed account ^

## 0 collections

TransUnion has no collections on file for you as of Jul 05, 2023. If you fall behind on payments, your lender or service provider may sell your debt to a collections agency, so remember to pay on time.

## 2 inquiries

These lenders have accessed your credit file:



CAPITAL ONE



Inquiry date

May 23, 2022

Removal date

Jun 2024



CAPITAL ONE



Inquiry date

Jul 23, 2021

Removal date

Aug 2023

11:05

◀ Search

EXHIBIT (A)



INTUIT  
creditkarma



View report from

Jun 19, 2023



## REBEKAH E HARRIS

# 595

Calculated using VantageScore 3.0

Provided by TransUnion

### Personal Information

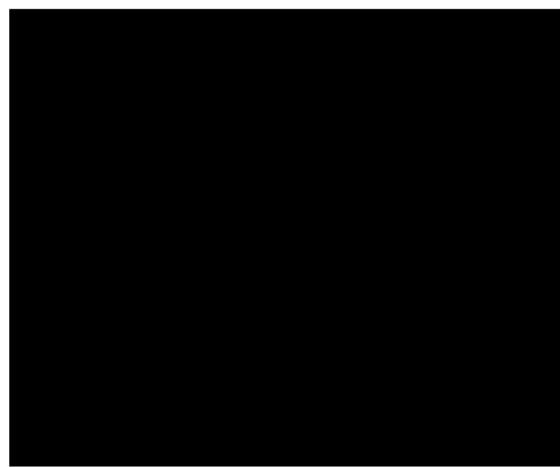
#### NAMES REPORTED

REBEKAH E HARRIS

#### EMPLOYMENT INFO

HMS HOST

#### ADDRESSES REPORTED



Today



Credit



Cards



Loans



Money

PRESS FIRMLY TO SEAL



PRESS FIRMLY TO SEAL

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\*Insurance does not cover certain items. For more information, see the Domestic Mail Manual at <http://pe.usps.com>.

\*\* See International Mail Manual at <http://pe.usps.com>.

**FLAT RATE ENV**  
ONE RATE ■ ANY WEIGHT

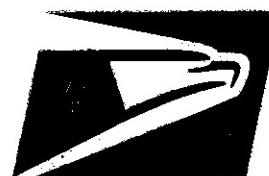
**TRACKED ■ INS**

**FROM:**

Rebeckah Harris  
2615 Chipmunk Ct.  
Bear, DE 19701

**TO:**

TransUnion LLC  
555 West Adams St.  
Chicago, IL 60661



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